

December 8, 1995



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and 2/1/96
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Mr. Lester Snow
CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

Dear Lester:

During the last several public workshops, including the one held on December 4, 1995, it has been strongly suggested that participants submit comments in writing in addition to those expressed in the workshop sessions. We are taking this opportunity to submit comments and suggestions on several independent issues, as listed below:

1. Baseline Conditions (No-Project Alternative)

A part of the December 4 workshop involved a breakout session where we were asked to consider alternative packages. The task was overwhelming and was made more complicated by the fact that we were not given adequate instructions as to what we should consider to be baseline conditions for any new alternatives.

The baseline condition issue was discussed at the end of the day in the full group session, but was left without a definitive conclusion. It might be best to have your staff develop a draft of a baseline condition for the next workshop along with some suggested alternatives. The workshop participants can then focus on a more complete alternatives package and perhaps can offer more constructive changes and/or additions.

We also strongly urge that the No-Project screening criteria not follow the same approach as the CVPIA PEIS. The PEIS criteria were far too restrictive and may exclude many likely projects.

2. Projects in Progress

At the December 4 workshop it was pointed out that the CALFED phasing process could advance interim projects in various stages of progress and was not intended to stand in the way or obstruct projects that would be consistent with the general objectives of CALFED. This would allow interim projects or projects in progress that serve to meet the goals or objectives of the CALFED Bay-Delta Program to come online at the earliest possible date and not delay the realization of benefits associated with each project. We strongly support this position.

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We suggest that the Delta Wetlands (DW) Project be included as an interim project. The draft environmental documentation (DEIR/EIS) has been completed and is available to CALFED. Without getting into specific details, we believe that the DW Project, as described in the DEIR/EIS, positively contributes to each of the four primary objectives of the CALFED Bay-Delta program. We also see the project as providing additional opportunities to closely coordinate operations with the SWP and CVP to provide additional water supply and environmental benefits. The DW Project can also facilitate water transfers and banking. We would be happy to discuss these opportunities with you and your staff at your convenience.

3. Water Supply Yield

The Department of Water Resources (DWR) should be asked as soon as possible to model the various new water projects under consideration in the state to establish a baseline of yields for potential projects. This information will be useful as the alternatives are configured in order to give the decision-makers some notion of how much additional water could be made available.

4. Georgiana Slough Hydraulic Barrier Project

We believe that any fix in the Delta will include the need to reduce cross-Delta fish transport through Georgiana Slough, especially if the reduction in fish transport can be accompanied by an increase in cross-Delta water flow. The Georgiana Slough hydraulic barrier project is a concept that we believe could achieve both of these goals and could be brought online in a relatively short period of time. DWR is familiar with this project and should be able to provide further input.

5. Funding for Levee Maintenance and Enhancement as a Means to Reduce System Vulnerability

The SB 34 program has functioned quite well in the Delta. The program needs to be extended as well as expanded to a higher funding level.

6. Stockpiling of Riprap for Emergency Use as a Means to Reduce System Vulnerability

Over the years we have learned that due to the limited amount of suitable equipment readily available for flood fights, Delta islands are extremely vulnerable during periods of time when

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excessively high water or excessively high wind creates numerous problems around the Delta. It is a hopeless feeling to know that you have to wait for a riprap barge and placement crane and that all you can do is fill sandbags and apply visquine to an eroding levee. If riprap were stockpiled on the interior top of slope in areas where problems are known to occur either due to weak levees or high wave action, the reclamation districts could save levees during far worse conditions than they are now prepared to do. The cost of riprap would likely be significantly lower if vendors distributed it at their convenience as opposed to an emergency basis.

Additional and perhaps separately funded riprap installation and stock piling programs would enhance protection during storm and flood events.

7. Alternative Proposal

As requested at the December 4 workshop, we have prepared an alternative from the potential action list. To expedite the preparation of the alternative, we have simply annotated the full "CALFED Potential Action List." See attached.

Delta Wetlands will continue to participate in the CALFED process and looks forward to the next public workshop. If you have any questions, please give us a call.

Sincerely,

David A. Forkel
Project Manager

DAF:kf
Enclosure

cc: Mr. James L. Easton - HYA Consulting Engineers
Mr. William J. Miller - Consulting Engineer
Ms. Mary Novak - Ellison & Schneider
all w/enclosure